ACETO CORPORATION
One Hollow Lane
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December 23, 2002

OVERNIGHT COURIER

United States Environmental Protection Agency
Region II
Emergency & Remedial Response Division
290 Broadway
New York, NY 10007-1866
ATTN: Seth Ausubel,
Remedial Project Manager

RE: **Request for Information Pursuant to the Comprehensive Environmental Response, Compensation, and Liability Act** – Arsynco, Inc., c/o Aceto Corporation
RE: The Berry's Creek Study Area, Bergen County, New Jersey

Dear Mr. Ausubel:

Enclosed is Arsynco, Inc.'s response to the above referenced Request for Information. If you have any questions or need further assistance, I can be contacted directly, via telephone, at 201-933-2323.

Sincerely Yours,

James Dillon
President, Arsynco, Inc.

cc: Clay Monroe, Office of Regional Counsel
Michael G. Stingone, Cole, Schotz, Meisel, Forman & Leonard, P.A.
Douglas Eilender, Cole, Schotz, Meisel, Forman & Leonard, P.A.
James Clabby, JMC Environmental Consultants
Douglas Roth, Aceto Corporation

JD/yr

1.a. State the correct legal name and mailing address of your Company.

ARSYNCO, Incorporated
511 13th Street
PO Box 8
Carlstadt, NJ 07072

b Identify the legal status of your Company (corporation, partnership, sole proprietorship, specify if other) and the state in which your Company was organized or formed.

Corporation – State of New Jersey

c. State the name(s) and address(es) of the President, Chairman of the Board, and the chief Executive Officer of your Company.

President:
James P. Dillon

ARSYNCO, Inc.
511 13th Street
PO Box 8
Carlstadt, NJ 07072

ACETO Corp.
One Hollow Lane
Lake Success, NY 10042

Chairman of the Board/CEO (Chief Executive Officer):
Leonard S. Schwartz

ACETO Corp.
One Hollow Lane
Lake Success, NY 10042

d. If your Company is a subsidiary or affiliate of another corporation, or has subsidiaries, identify each such entity and its relationship to your Company, and state the names(s) and address(es) of each such entity's President, Chairman of the Board, and Chief Executive Officer.

Subsidiary of:
Aceto Corporation
One Hollow Lane
Lake Success, New York 11042-1215

President/Chairman of the Board/ CEO (Chief Executive Officer):
Leonard S. Schwartz

e. Identify the state and date of incorporation and the agent for service of process in the state of incorporation and in the State of New Jersey for your Company and for each entity identified in your response to Question 1.d., above.

ARSYNCO (Incorporation)
State: New Jersey
Date: June 29, 1969
Agent: Douglas Roth

ACETO (Incorporation)
State: New York
Date: 1947
Agent: Douglas Roth

Vice President/CFO (Chief Financial Officer):
Douglas Roth

ACETO Corp.
One Hollow Lane
Lake Success, NY 10042

f. If your Company is a successor to, or has been succeeded by another entity, identify such other entity and provide the same information requested in question 1.e., above.

SUCCESSOR TO	TRACT (See Attachment F in the SES)	FROM	TO	INFORMATION REQUESTED (1.e.)
Inmont Corporation (formerly Interchemical Corp.)	1 & 2	December 1961	July 1969	unknown
Fries Bros., Inc.	1 & 2	September 1955	December 1961	unknown
UNKNOWN	1 & 2	September 1945	September 1955	unknown
Commercial Solvents Corp.	1 & 2	October 1942	September 1945	unknown
PA Alcohol & Chemical Corp. (formerly Franco American Chemical Works)	1 2	December 1925 June 1928	October 1942 October 1942	unknown unknown
Moses & Josephine Trubek	Tract 1	June 1920	December 1925	unknown
Victor & Eugene King	Tract 1	unknown	June 1920	unknown
Carlstadt Holding Corp	Tract 2	January 1927	June 1928	unknown
Sarah Berry	Tract 2	unknown	January 1927	unknown

2. Provide a description of the Site, i.e. the property or properties in Carlstadt, Bergen County, New Jersey, which your Company owns or upon which it operated or leased. Include Block and Lot numbers, names of streets or physical features bounding the property(ies), and acreage.

Arsynco has owned the property known as Block 91, Lot 1 since 1969. As discussed in Question 1.f. above the property has been owned and operated by a number of chemical companies dating back to approximately the 1920s; these previous chemical companies conducted operations similar in nature to Arsynco. The eastern portion of the property is known as Block 91, Lot 1, Tract 2. This section consists of approximately 2.8 acres and, due to constant ponding and flooding, this land has never been used by Arsynco, Inc., and is considered wetlands. The main portion of the Arsynco property, known as Block 91, Lot 1, Tract 1, consists of approximately 9.5 acres of land. The total acreage of the entire property is approximately 12.3 acres.
The main entrance/exit to the Arsynco property is located on the south side of the site, at the end of 13th Street. A secondary entrance/exit is located on the northwest corner of the site, along the Berry Avenue extension. The property is bordered on the South by Caschem Chemical Company, Aluminum Anodizing Inc., (southwest) and East Coast Toyota Service Center (southeast). It is bordered on the North by Northern Eagle Beverage Co. Approximately 20 acres of vacant land owned by Cognis, Inc. (formerly Henkel Corp.) lies just to the north of the access road to Northern Eagle Beverage Co. from the Berry Avenue extension to Rt.-17 North. The entire manufacturing facility was demolished in 1993 – 1994, except for a former guard house and office buildings at the 13th Street entrance/exit. The office is currently occupied by one person – JP Dillon (see Attachment 1, appended).

3. Provide a narrative description of the nature of the Company's business. If the nature of the Company's business changed over time, please explain how it changed, (including any name changes) and approximately when the changes occurred.

Arsynco, Inc. was involved in the manufacture of specialty organic chemical and pharmaceutical ingredients and intermediates, such as salts of phenylpropanolamine for inclusion in products such as Contact and Alka Seltzer Plus, propylene imine and derivatives, sun screens, hair dyes (aromatic amines), silicone intermediates, a quaternary ammonium salt, propiophenone and isobutyrophenone. Operations were batch-type in nature, and batch sizes range from 200 to 3,000 pounds. A majority of the operations were manual. However, the steam and vacuum components of the processes were semi-automatic. Reactor vessels range in sizes from 200 to 2,000 gallons. Heat was supplied from steam, electricity or oil. After a manufacturing order was initiated, a batch schedule was maintained for every batch operation that included all relevant process data (quantities, dates, etc.). Raw materials were delivered to the site in a variety of containers including tank wagon, steel, plastic and fiber drums, bags, gas cylinders, bottles, cans, etc. The facility also had numerous above-ground diked storage tanks for the bulk storage of certain process chemicals. There were two (2) major, diked tank farms at the Site and numerous other storage vessels located in and outside the site buildings.
Raw materials, as well as, intermediates and finished goods were stored in designated indoor and paved outdoor locations depending on their use, need for accessibility and type of container. Fiber drums, bags, etc., were always stored indoors. Finished products made to customer specifications were shipped in lots of 50 lbs. to 10,000 lbs. quantities. The nature of Arsynco, Inc. business did not change over the time it has operated on the site.

4. Please specify the time period during which the Company leased, owned, and/or operated the Site. If your Company ever leased the Site, provide copies of leases, names, current addresses and telephone numbers of each owner of the Site during the period the Company leased the Site.

Arsynco, Inc. owned and operated the site from July 1969 to September 1993. It has owned the Site from July 1969 to the present. The company has never leased the site.

5. Describe in detail the nature of the relationship between the Company and the following entities:
(1) Aceto Corporation; (2) Fries Brother; (3) Interchem; (4) Inmont; (5) BASF. Indicate the time and manner in which the relationships were established. Specifically address the relationships as they pertain to any current or past operations or ownership at the Site.

Fries Bros. Inc. sold the site and the business to Interchemical Corp. in December, 1961. Interchem Corp. changed its name to Inmont Corp. during the mid 1960's. Inmont sold the site and the business to Arsynco, Inc. July 1969. (Arsynco, Inc. was formed). BASF acquired Inmont Corp. after the Arsynco, Inc. acquisition.

6. Describe the Site at the time the Company took possession of it. If there was any business at the Site, explain the nature of that business.

The site was basically the same when the Company took possession of it in 1969, as the description given in Question 2 above. The main entrance/exit to the Site in 1969, however, was the Berry Avenue extension from Rt-17 North. The secondary entrance/exit was at the end of 13th Street: The entire manufacturing facility, consisting of 18 buildings, was located on Tract 1. (See Attachment F (in the SES), appended). Tract 2 was vacant wetlands, as it is today. 16th Street did not exist nor did Northern Eagle Company, and its access road to Rt-17 North
The 20 acres to the north had a different owner (Diamond Shamrock(?)). The south and west were bordered as described in Question 2 above. Caschem Chemical Company, however, was owned at that time by a company known as Cosan Chemical . A pond measured approximately 150 feet long and 75 ft. wide was present on the east side of Tract 1. This pond was filled sometime between 1970 and 1973, and no longer exists. A smaller pond, also on Tract 1 and located directly to the west of the existing office building, was filled in 1993 – 1994.
The nature of the business was basically the same as described in Question 3 above. More solvents, however, were stored in drums since there was less diked storage tank capacity available. The roads and the outside storage areas were not paved as extensively as described in Question 3 above.

7. Describe in detail the nature of the activities conducted by the Company at the Site from the time the Company began operations at the Site until the present time, including:

a. the services performed at the Site;

b. all products which the Company manufactured, supplied, or sold which resulted from activities at the Site;

c. research and development activities; and

d. the time period during which those activities occurred.

a. As described in Question 3 above, the Company manufactured pharmaceutical ingredients and their intermediates, fine organic chemicals and their intermediates, and cosmetics and their intermediates. These products were used by their respective industries to manufacture their finished products. Chemical activities were commercial scale chlorination, hydrogenation, condensation, oxidation, reduction, esterification, and amination. These activities included distillation, crystallization, tray and vacuum dying and solvent recovery.

b. PRODUCTS:

Homo Menthyl Salicylate
Propylene Imine
Methyl Azirdine Phosphene Oxide
SIMA (Methyl,Vinyl,Di-(N-Methyl Acidamido) Silane
-N-Methyl Acetamide
Phenyl Propanol Amine Hydrochloride
Phenyl Propanol Amine Bitartarate
Propiophenone
Isobutyropophenone
Falba (Mixture of Mineral Oil, Beeswax, Woolwax, Paraffin Wax, Lanolin)
Glycerol Dichlorhydrin
Quat – DS (Quaternary Ammonium Salt)
3,5,5,Trimethyl Cyclohexanol
N,N,Dimethyl Benzylamine
ZK-47 (Imine Terminated Monomer in Xylene)
ITP-63 (Imine Terminated Polymer)
Melilotin (Di-Hydro Coumarin)
Rosetone (Alpha-Trichloro Benzyl Acetate)
Mono Methyl Hydroquinone
Dimethyl Hydroquinone
PMIC – Phenyl Methyl Iso-Oxazole Carboxylic Acid Chloride
CMIC – Chloro Phenyl Methyl Iso-Oxazole Carboxylic Acid Chloride
DCMIC – Di- Chloro Phenyl Methyl Iso-Oxazole Carboxylic Acid Chloride
Alpha-Phenoxyl Propionyl Chloride
O20 (2-Nitro, N (p-phenol) Aniline)
O22 (4-Nitro, N_1 (Bis-Hydroxy Ethyl), N_3 (Hydroxy Ethyl),1-3-Phenylene Diamine)
132 (2-Nitro, N (Hydroxy Ethyl) Aniline)
148 (2-Nitro, N_1 (Hydroxy Ethyl), 1-4-Phenylene Diamine)
Benzyl Cyanide
Mustard Oil (Allyl Iso-Thio Cyanate)
Trimellitic Acid Chloride

INTERMEDIATES:

Isonitroso Propriophenone
Phenyl Propanol Amine
O22 A (4-Nitro, N_1 (Bis-Hydroxy Ethyl) 1-3 Phenylene Diamine
PMIA – Phenyl Methyl Iso-Oxazol Carboxylic Acid
CMIA – Chloro Phenyl Methyl Iso-Oxazol Carboxylic Acid
DCMIA – Di-Chloro Phenyl Methyl Iso-Oxazol Carboxylic Acid
Alpha Phenoxy Proprionic Acid

c. Research and development activities were conducted in Building #20 located in the southwest corner of the property. It focused primarily on translating known laboratory organic synthesis from bench to plant scale, (process development), process improvement and trouble shooting existing plant processes.

d. The activities described in a., b., c. above occurred between July 1969 and September 1993, at which time manufacturing ceased at the Site. Since that time, the remaining office building continues to be used for administrative purposes.

8. When did your Company cease operations at the Site? Describe the circumstances that precipitated your Company's decision to cease operations at the Site.

The Company ceased operations at the Site in September, 1993. Depressed market conditions coupled with the regulatory environment and the rising costs of compliance indicated that the Company could no longer expect a reasonable return on investment.

9. Did your company in the past, or does your company presently, generate hazardous wastes at the Site? Please describe your company's treatment, storage and/or disposal practices for any hazardous wastes generated at the Site.

Arsynco, Inc. generated hazardous waste while the plant was in operation and immediately after ceasing manufacturing in 1993. Presently, Arsynco, Inc., is not generating any hazardous waste. It is expected that once a clean-up plan is approved by the State of New Jersey, and the clean-up started, hazardous waste will be generated at the Site.
There was no treatment of hazardous waste on the Site (see Question 13 – Treatment of Industrial Waste). Up to approximately 1990 hazardous waste was stored primarily in 55 gallon steel drums in a location adjacent to the employer parking lot on the southern part of the facility. Subsequently, the location was changed to a paved area on the west side of the facility, north of the R&D building (Building 20). Both these areas were used to accumulate containers for less than 90 days, at which time they were properly manifested and sent to EPA approved facilities for off-site disposal.

10. Provide a list of all local, state and federal environmental permits ever granted for the Site or any part thereof (e.g., RCRA permits, NPDES permits, etc.)

Discharge Permits:

NUMBER	DISCHARGE ACTIVITY	DISCHARGED TO:
NJ0030970	Non-contact Cooling Water	Berry's Creek
NJ0101958	Infiltration/Percolation	Ground water

MISS

Bergen County Utility Authority	(SU1)	Permit Number 930392
NJDEP	(Well Permit)	Permit Number 10606W
NJDEP	(Physical Connection)	Permit Number 868
Borough of Carlstadt	(Smoke Permit)	Permit Number 279S

NEW JERSEY BUREAU OF AIR POLLUTION CONTROL

Certificate Number	Certificate Number	Certificate Number
109751	102169	099809
102191	107250	099518
099517	100517	040127
051574	065729	007361
105189	108057	108058
105190	105188	105043
105540	107781	105542
105541	101525	107161
102190	101585	106265
102500	103691	098256
104107	101884	107782
097562	097970	049251
049262	103690	081964
049264	049263	049268
049269	049270	104043
103150	049280	049260
105846	100579	049255
093410	103689	107249
049259	049257	049282
099516	066508	049271
094583		

11. List all hazardous substances (as defined in the "Instructions", which were or are used, stored, or handled at the Site.

Toluene	Rainey Nickel Catalyst
Xylene	Ethylene Oxide
Gasoline	Sodium Hydroxide, (20%)
Methanol	Sodium Hydroxide, (solid)
Methyl Acetate	Sodium Cyanide
Isopropanol	Ammonia (gas)
Methylene Chloride	Ammonium Hydroxide (20%)
1,1,1, Trichloro Ethane	Epichlorohydrin
Chloroform	Methyl Vinyl Dichloro Silane
Hydrochloric Acid (37%)	P-Benzoquinone
Hydrogen Chloride	Aniline
Phosphoric Acid, (85%)	Phenol
Propionic Acid	P-Amino Phenol
Isobutyric Acid	Benzyl Chloride
Acetic Acid (glacial)	Dimethyl Amine, (60%)
Acetic Anhydride	Mono-Methyl Amine, (40%)
Sulfuric Acid, (93%)	Alpha Phenoxyl Propionyl Chloride
Phosphorous Oxychloride	Dimethyl Sulfate
Phosgene	Monoethanol Amine
Thionyl Chloride	Methyl Vinyl Di(-N-Methyl Acetamido) Silane
Propylene Imine	Alpha Phenoxy Propionyl Chloride
[Tris 1-(2,Methyl) Aziridine] Phosphene Oxide	Phenyl Methyl Iso Oxazol Carboxyl Acid Chloride
Hydrogen	Chloro Phenyl Methyl Iso Oxazole Carboxylic Acid Chloride
	Di Chloro Phenyl Methyl Iso Oxazole Carboxylic Acid Chloride
	Sodium Methylate

12. State when and where each substance identified in your response to Question 11 was used, stored, or handled at the Site and the volume of each substance.

Starred (*) substances are materials that have been used or manufactured at the site from 1958 until mid 1993. Volumes and weights are approximations of the amounts in storage during normal manufacturing conditions.
The other substances are materials that have been used or manufactured at the site until approximately 1985, and are recalled from memory. Volumes are approximation of the amounts in storage while they were being used or made.

See Attachment F in the SES for building locations and volumes

HAZARDOUS SUBSTANCE	USED IN BLDG. #	STORED/HANDLED	VOLUME
*Toluene	1, 8	See Attachment F (in the SES)	See Attachment F (in the SES)
*Xylene	1, 6, 8, 19	See Attachment F (in the SES)	See Attachment F (in the SES)
Gasoline	trucking	UST Building #1	Approx. 20 gallons/day from 1958 – 69.
*Methanol	1, 6, 8	See Attachment F (in the SES)	See Attachment F (in the SES)
*Methyl Acetate	6	See Attachment F (in the SES)	See Attachment F (in the SES)
*Isopropanol	8	See Attachment F (in the SES)	See Attachment F (in the SES)
Methylene Chloride	1, 6	See Attachment F (in the SES)	See Attachment F (in the SES)
1,1,1, Trichloro Ethanol	8	55 gallon drums	1000 gallons
Chloroform	1	55 gallon drums	500 gallons
Hydrochloric Acid (37%)	8	See Attachment F (in the SES)	See Attachment F (in the SES)
Hydrogen Chloride	1, 20	Cylinders	300 lbs.
*Phosphoric Acid, (85%)	6	55 gallon plastic drums	500 gallons
Propionic Acid	1	See Attachment F (in the SES)	See Attachment F (in the SES)
Isobutyric Acid	1	See Attachment F (in the SES)	See Attachment F (in the SES)
Acetic Acid (glacial)	1, 8	55 gallon drums	5000 gallons
Acetic Anhydride	1,8	55 gallon drums	5000 gallons
*Sulfuric Acid, (93%)	8, 19	See Attachment F (in the SES)	See Attachment F (in the SES)
*Phosphorous Oxychloride	6	55 gallon plastic drums	1000 lbs.
Phosgene	1	Cylinders	4000 lbs.
Thionyl Chloride	1	55 gallon drums	5000 lbs.
*Propylene Imine	19, 4	Cylinders and drums	10,000 lbs.
*[Tris 1-(2,Methyl) Aziridine] Phosphene Oxide	6, 1, 4	30-; 55 gallon drums	2000 lbs.
Hydrogen	8	See Attachment F (compressed gas)	80,000 c.f.
Rainey Nickel Catalyst	8, 17, 18	5 gallon cans	200 lbs.
Ethylene Oxide	8	55 gallon drums	500 lbs.
Sodium Hydroxide, (20%)	1, 6, 8, 19	See Attachment F (in the SES)	See Attachment F (in the SES)
Sodium Hydroxide, (solid)	1, 6, 8, 19	55 gallon drums	5000 lbs.
Potassium Hydroxide	6	55 gallon drums	5000 lbs.
Sodium Cyanide	1	55 gallon drums	1000 lbs.
Dimethyl Sulfate	8	55 gallon drums	4000 lbs
Ammonia (gas)	1, 20	Cylinders	100 lbs.
Ammonium Hydroxide (20%)	1	55 gallon drums	2000 lbs.
Epichlorohydrin	8	55 gallon drums	4000 lbs.
Methyl Vinyl Dichloro Silane	6	55 gallon drums	5000 lbs.
P-Benzoquinone	1	40 gallon fiber containers	500 lbs.
Aniline	1	55 gallon drums	5000 lbs.
Phenol	8	55 gallon drums	5000 lbs.
P-Amino Phenol	1	55 gallon drums	5000 lbs.
Benzyl Chloride	1	55 gallon drums	5000 lbs.
Dimethyl Amine (60%)	6	55 gallon drums	5000 lbs.
Monoethanol Amine	8	55 gallon drums	5000 lbs.
Methyl Vinyl Di(-N-Methyl Acetamido) Silane	6, 4	55 gallon drums	5000 lbs.
Alpha Phenoxy Propionyl Chloride	1, 4	55 gallon drums	5000 lbs.
Phenyl Methyl Iso Oxazol Carboxylic Acid Chloride	1, 4	55 gallon drums	5000 lbs.
Chloro Phenyl Methyl Iso Oxazol Carboxylic Acid Chloride	1, 4	55 gallon drums	5000 lbs.
Dichloro Phenyl Methyl Carboxylic Acid Chloride	1, 4	55 gallon drums	5000 lbs.
Sodium Methylate	17, 18	25 lb. pails	2000 lbs.
Mono-Methyl Amine, (40%)	6	See Attachment F (in the SES)	6000 gallons

13. Describe in detail how and where the hazardous wastes, industrial wastes, and hazardous substances generated, handled, treated, and stored at the Site were or are disposed of. If any hazardous wastes, hazardous substances, or industrial wastes were or are taken off-site for disposal or treatment, state the names and addresses of the transporters and the disposal facility used.

Hazardous wastes were generated from the handling of hazardous substances used at the Site., e.g., spent solvents, still bottoms, contaminated safety equipment, off spec raw material and off spec product, etc. Question 9 above describes the storage and disposal of hazardous waste at the Site. Solvents (Toluene, Xylene, Methylene Chloride, Methyl & Isopropyl Alcohol were recovered and "rehabilitated" via distillation and reused (recycled).

All process waste water was directed to the effluent treatment basin (ETB); here it was neutralized (pH 6 to 8), skimmed of insolubles, and the solids were allowed to settle. The liquid was then aerated and discharged to the Bergen County Utility Authority (BCUA) via the 13th Street sewer line, in accordance with BCUA permit requirements.

The skimmed insolubles were collected in 55 gallon drums and disposed of off-site as hazardous waste. Yearly, during the summer plant shut-down the sludge was removed from the ETB and disposed of off-site as hazardous waste.

NOTE: Originally (in 1969), the treated process wastewater was discharged to what was then known as the "Joint Meeting" sewer line on 13th Street.

Hazardous raw materials were stored in specific areas depending on their hazardous classification, e.g., bulk flammable liquids (xylene methanol, and so forth) were stored in diked storage tanks situated on the perimeter of the manufacturing area. Bulk corrosive raw materials were also stored in diked storage tanks. Toxic materials usually packaged in drums (liquids) or fiber containers (solids) were stored in special areas of Building 17 and Building 18. See Attachment F in the SES.

Hazardous products were stored in DOT approved containers (steel or plastic drums, cylinder, etc.), labeled and shipped in accordance with DOT regulations. Names and addresses of transporters and disposal facilities used are not available.

14. Who determines/determined where to treat, store, and/or dispose of the hazardous substances and/or hazardous wastes handled at the Site? Provide the names and current or last known addresses of any entities or individuals which made such determination.

James Dillon
ARSYNCO, Inc.
511 13TH Street
PO Box 8
Carlstadt, NJ 07072

Wesley Bennett (deceased)
Six Niles Avenue
Madison, NJ 07940

Emil Epolito
30 Wilson Avenue
Chatham Township, NJ 07928

15. Describe in detail the remedial activities conducted at the Site under CERCLA, the Resource Conservation and Recovery Act (RCRA), and /or laws of the State of New Jersey. Describe your Company's involvement in the remedial activities.

Remedial Activities conducted under RCRA.

Arsynco completed a soil sampling investigation in June, 1992, in connection with the closure of a former RCRA storage area. The RCRA storage area closure investigation was approved by, and conducted under the supervision of NJDEP personnel. The Department accepted closure of the former RCRA storage area in December 1992.

Remedial Activities conducted under laws of the State of New Jersey

Due to the cessation of all operations at the site in 1993, Arsynco commenced with an Industrial Site Recovery Act (ISRA) compliance program at that time. The ISRA compliance program has been conducted under the supervision of NJDEP since that time.

As part of the plant shut-down and site decommissioning program, Arsynco properly disposed of all waste materials, cleaned and removed all process equipment, completed an asbestos abatement program and demolished most of the site structures. All hazardous wastes which had accumulated during normal facility operations and the site decommissioning program, as well as, all surplus materials that were not used or returned to the supplier, were properly disposed off-site. Waste disposal operations associated with the cessation of operations began in June 1993, and nearly all waste disposal was completed by June 1994.

15. (continuation)

During 1993, all storage tanks, process vessels, and other equipment (including all associated piping) were emptied and cleaned, (if necessary), and taken out of service. All liquids generated during the tank and process equipment cleaning operations were either manifested off-site for proper disposal/recycling or were routed to the facility effluent treatment basin for proper treatment before being discharged via sanitary sewer to the Bergen County Utilities Authority (BCUA) under approval from BCUA and in accordance with Arsynco's BCUA permit requirements. All solids/sludge materials generated during the tank and process equipment cleaning operations were manifested off-site for proper disposal.

Prior to building demolition activities, all asbestos containing materials (ACM) present in the site structures slated for demolition were properly removed and disposed off-site. Asbestos abatement activities were conducted during the period August through December 1993.

Once all manufacturing related materials and ACM were removed from the site and all process equipment and tank systems were cleaned and decommissioned, site dismantling operations were initiated. All process equipment was dismantled, rigged and removed from the site from December 1993 through March 1994. Demolition activities were conducted from December 1993 through October 1994. All wood material was shipped to a commercial wood recycler. All steel/iron removed was transported to a scrap metal facility for recycling. All concrete and brick rubble was transported off-site to the Meadowlands landfill. Please note that building demolition activities involved the removal of building roofs and walls only. All floor slabs were left in place on the site.

Following building demolition, all sub-surface drainage lines and piping present at the site, as well as the facility effluent treatment basin, were excavated and removed. Following removal of all drainage systems, the concrete floor slabs of the demolished buildings were crushed in place in order to investigate the soils below the buildings; all crushed floor slabs are still present on the site.

Following site decommissioning, Arsynco conducted extensive Site Investigation and Remedial Investigation (SI/RI) phase sampling programs for both soil and groundwater at the site, and all results were provided to NJDEP and USEPA.

A proposed Remedial Action Workplan (RAW) for the site was subsequently requested by NJDEP. Therefore, in February 1999, following a thorough evaluation of remedial alternatives and the completion of field pilot study work, Arsynco submitted a proposed RAW to both NJDEP and USEPA.

On March 28, 2000, thirteen months after the submittal of the proposed RAW, NJDEP issued comments and responses to the proposed RAW and requested the submittal of additional data and the collection of additional soil and groundwater samples from various areas of the site.

On May 11, 2000 Arsynco submitted additional information to NJDEP in accordance with the Department's March 2000 response letter. In May 2001, fourteen months after submittal of the May 2000 letter from Arsynco, NJDEP issued additional comments requiring further sampling at the site. The additional investigative activities requested by NJDEP are nearing completion, and a revised RAW is being prepared for submittal to the Department (see Question #22).

It should also be noted that in October 1998, Arsynco also submitted an application for the use of a Risk-Based Cleanup Approval to USEPA for the remediation of PCB's in accordance with 40 CFR 761.61. Arsynco is still working with USEPA on the proposed PCB remediation plan, and Arsynco is currently coordinating a meeting with Mr. David Greenlaw, the USEPA Region 2 PCB Program Coordinator, to review the proposed remedy for PCB's in fill soils at the site.

16. Identify all leaks, spills, or releases into the environment of any hazardous substances, pollutants, or contaminants that have occurred, or are occurring, at or from the Site. Specifically identify and address any leaks, spills, or releases to the Berry's Creek Study Area. In addition, identify:

a. when such releases occurred;

b. how the releases occurred;

c. the amount of each hazardous substances, pollutants, or contaminants so released (for substances contained in any sewage effluent from the Site, provide discharge monitoring reports or other data indicating discharge concentrations and loads, as available);

d. where such releases occurred;

e. where such releases entered the Berry's Creek Study Area, if applicable; and

f. the pathway by which such releases entered the Berry's Creek Study Area, including any storm sewers, pipes, or other conveyances discharging to a water body or wetland; or via surface runoff, groundwater discharge, or any spills leaks, or disposal activities.

16. (continuation)

Attachment J of the SES document submitted in response to Question 22 describes all the leaks, spills, or releases into the environment of any hazardous substances, pollutants or contaminants that have been reported to the NJDEP. A copy of this document is included with this response to the Request for Information. The incident that occurred on October 14, 1992 and reported to the NJDEP on November 4, 1992 and November 12, 1992 – (Case #: 92-10-14-0939-48), specifically refers to a release of 50 gallons of Xylene to the Berry's Creek Study Area via a tidal ditch located adjacent to Building #19 (see Attachment 2 appended).

Other releases, as defined in the Request that have occurred, are as follow:

During the early to mid-1960's, we believe large quantities (55 gallon drums) of material containing PCB's were buried by Inmont Corp., in the Southeast area of Tract 1. There is no evidence at this time, this release entered the Berry's Creek Study Area.

During the early 1970's (1970 – 1971), material containing possible contaminants were buried on the site, along with other fill material in the former pond area (see Attachment I in the SES) on the eastside of Tract 1. There is not evidence at this time that this release entered the Berry's Creek Study Area.

17. Please complete the form on page 5, below. Indicate on the form whether each of the chemicals listed has ever been released from the Site to the Berry's Creek Study Area, including creeks, ditches, or other water bodies, or wetlands. Follow all additional instructions on the form. In addition, please answer Question 16, above, specifically addressing any chemicals for which you answered "yes".

18. Identify all companies, firms, facilities, and individuals (hereafter referred to as "customers") from whom your Company obtained materials containing Industrial Waste as defined in Number 6 of the Definitions and whose Industrial Waste was treated, stored, handled or disposed of at the Site. For each such customer:

a. Describe the relationship (the nature of services rendered and products purchased or sold)between your Company and the customer;

b. Provide copies of any agreements or/and contracts between your Company and the customer;

c. Provide the name and address of each customer who send such materials, including contact person(s) within said customer;

d. Provide shipping and transaction records pertaining to such Industrial Wastes sent by each customer, including but not limited to invoices, delivery receipts, receipts acknowledging payment, ledgers reflecting receipt of payment, bills of lading, weight tickets, and purchase orders; and

e. Provide the name and address of all companies and individuals who transported Industrial Wastes to the Site.

Starting in the mid-1980's, Arsynco, Inc. purchased 20% Sodium Acetate Solution from :
Cosan Chemical
13th Street
Carlstadt, NJ 07072

This material was an industrial by-product that was generated at the Cosan Chemical site. Arsynco, Inc. regarded this material as raw material, and not waste. Cosan Chemical and Caschem, were regarded as suppliers, not "customers". The materials was used by Arsynco, Inc. as a substitute for Sodium Hydroxide in selective manufacturing operations. This arrangement continued when Caschem Chemical Company. purchased the Cosan Chemical facility and continued to Sept 1993 when manufacturing operations ceased. As described in Question 2 above, the Caschem Chemical Company facility borders the southern part of the Arsynco site. No records of any agreement or contracts, contact persons, shipping papers between the Arsynco Inc. and Cosan Chemical /Caschem Chemical Company have been found. No other companies or materials are known to have transported industrial waste to the site.

19. For each customer's Industrial Wastes handled, treated, stored, or disposed of at the Site, describe:

i. the volume;
ii. the nature;
iii. chemical composition;
iv. color;
v. smell;
vi. physical state (e.g., solid, liquid);
vii. any other distinctive characteristics; and
viii. the years during which each customer's materials were handled, treated, stored, or disposed of at the Site.

i. Volume: Approximately 5000 gallons/day
ii. Nature: organic salt and water
iii. Chemical composition: 20% Sodium Acetate in water – trace of Mercury.
ix. Color: Water White (Clear)
x. Smell: Odorless
xi. Physical state: Liquid
xii. Distinctive characteristics: pH-10 (approximately)
xiii. Years during which each customer's materials were handled, treated, stored, or disposed of at the Site: 1984 to 1993 (approximately)

20. Please supply any additional information or documents that may be relevant or useful to identify other companies or sources that sent industrial wastes to the Site.

As stated in the Answer to Question 18, no other companies or individuals are known to have transported industrial waste to the site. There is no additional information or documentation that may be relevant or useful to identify other companies or sources that sent industrial waste to the site.

21. Please state the name, title and address of each individual who assisted or was consulted in the preparation of your response to this Request for Information and correlate each individual to the question on which he or she was consulted.

Consultant on Question 1e: Douglas Roth, Chief Financial Officer ACETO Corp. One Hollow Lane Lake Success, NY 11042	Consultant on Question 15: James Clabby JMC Environmental Consultants, Inc. 1126 Concord Drive Brick, NJ 08724	Legal Advisor to all Questions: Douglas Eilender, Esq. Cole , Schotz, Meisel, Forman & Leonard, P.A. Court North Plaza 25 Main Street Hackensack, NJ 07601

22. For each question herein, identify all documents consulted, examined, or referred to in the preparation of the answer or that contain information responsive to the question and provide true and accurate copies of all such documents.

1. Site Evaluation Submission (SES) – submitted to NJDEP - March 23, 1993 [Questions 1, 2, 3, 6, 9, 12. 13. 16]
2. Remedial Investigation Report – submitted to NJDEP June (26), 1997 (Question 15)
3. Remedial Action Selection Report and
   Remedial Action Work Plan – submitted to NJDEP – February (25), 1999 (Question 15)
4. Letter from NJDEP dated March 28, 2000 to D. Hird, Esq.; responding to #2 and #3 above. (Question 15)
5. Letter from JMC Environmental Consultants, Inc. dated May 11, 2000 to John King, Case Mgr./NJDEP; responding to #4 above. (Question 15)
6. Letter from NJDEP dated May 1, 2001 to D. Hird, Esq.; responding to #5 above. (Question 15)
7. Arsynco, Inc. Standard Cost FYE 6-30-93. [Questions 7, 11, 12, 18]

Request for Information Regarding Chemical Releases to the Berry's Creek Study Area

* * *

Instructions: As instructed in Question 17, please complete this form by marking the appropriate spaces. Indicate whether each of the chemicals listed has ever been released from the Site to the Berry's Creek Study Area, including creeks, ditches, or other water bodies, or wetlands. Follow additional instructions below. Return the completed form along with your other responses to the Request for Information in the Matter of the Berry's Creek Study Area, Bergen County, New Jersey. N/A signifies no information available.

	Yes	No	N/A
acenaphthene			X
acenapthylene			X
anthracene			X
aluminum			X
antimony			X
arsenic			X
benz(a)anthracene			X
benzene			X
benzo(a)pyrene			X
benzo(b)fluoranthene			X
benzo(g,h,i)perylene			X
benzo(k)fluoranthene			X
bis(2-ethylhexyl)phthalate			X
butyl benzyl phthalate			X
cadmium			X
chlorinated dibenzo-p-dioxins (if "yes", please list specific dioxin compounds on a separate sheet)			X
chlorinated dibenzofurans (if "yes", please list specific compounds on a separate sheet)			X
chlorobenzene			X
chloroform			X
chromium			X
chrysene			X
copper			X
cyanide			X
dibenz(a,h)anthracene			X
dichlorobenzene			X
1,2-dichloroethene			X
di-n-butyl phthalate			X
1,2-dichlorobenzene			X
1,2-dichloroethane			X
dieldrin			X
di-n-octyl phthalate			X
ethylbenzene	X(1)		
fluoranthene			X

	Yes	No	N/A
fluorene			X
hexachlorobenzene			X
indeno(1,2,3-cd)pyrene			X
lead			X
manganese			X
mercury			X
methylene chloride			X
methyl ethyl ketone			X
methyl mercury			X
2-methylnaphthalene			X
naphthalene			X
nickel			X
pentachlorophenol			X
petroleum hydrocarbons			X
phenanthrene			X
phenol			X
polychlorinated biphenyls (if "yes" please list specific congeners and aroclors on a separate sheet)			X
polycyclic aromatic hydrocarbons (if "yes", please list specific compounds on a separate sheet if not listed on this page)			X
pyrene			X
selenium			X
silver			X
1,1,2,2-tetrachloroethane			X
tetrachloroethylene			X
thallium			X
toluene			X
1,2-trans dichloroethylene			X
1,1,1-trichloroethane			X
trichloroethylene			X
vinyl chloride			X
xylene	X		
zinc			X

(1) Present in Industrial Xylene

James P. Dillon
Name of person completing form

Arsynco, Inc.
Company

Arsynco, Inc.
Site (as defined in the "Instructions")

CERTIFICATION OF ANSWERS TO REQUEST FOR INFORMATION

State of New York

County of NASSAU

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document (response to EPA Request for Information) and all documents submitted herewith, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete, and that all documents submitted herewith are complete and authentic unless otherwise indicated. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. I am also aware that my company is under a continuing obligation to supplement its response to EPA's Request for Information if any additional information relevant to the matters addressed in EPA's Request for Information or the company's response thereto should become known or available to the company.

James P. Dillon
NAME (print or type)

President/Arsynco, Inc.
TITLE (print or type)

SIGNATURE

Sworn to before me this 18th

day of Dec , 2002

Notary Public

JULIANNE M. TYBURSKI
Notary Public, State of New York
No. 01TY9404831
Qualified in Queens County
Certificate Filed in New York County
Commission Expires May 31, 2006